#### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a	)	
Canadian corporation, and J-SQUARE	)	
TECHNOLOGIES (OREGON) INC., an	)	
Oregon corporation,	)	
	)	C.A. No.04-CV-960-SLR
Plaintiffs,	)	
	)	
v.	)	
	)	
MOTOROLA, INC., a Delaware	)	
corporation.	)	
	)	
Defendant.	)	

## MOTOROLA'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56(b), Defendant Motorola, Inc., moves for summary judgment on all remaining counts. Motorola also moves for summary judgment regarding Plaintiffs' claims for reliance and lost profits damages. The grounds for this motion are set out in Motorola's Opening Brief in Support of Its Motion for Summary Judgment filed herewith.

# YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ William W. Bowser William W. Bowser (Bar I.D. 2239) The Brandywine Building, 17th Floor 1000 West Street Wilmington, Delaware 19801 Telephone: (302) 571-6601; Facsimile: (302) 576-3282 wbowser@ycst.com OF COUNSEL: Randy Papetti, Cory A. Talbot, Emily S. Cates Lewis and Roca LLP 40 N. Central Avenue Phoenix, Arizona 85004 Telephone: (602) 262-5311 Attorneys for Defendant

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a	)	
Canadian corporation, and J-SQUARE	)	
TECHNOLOGIES (OREGON) INC., an	)	
Oregon corporation,	)	
Plaintiffs,	)	
v.	)	C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware corporation.	)	
Defendant.	)	

### **CERTIFICATE OF SERVICE**

I, William W. Bowser, Esquire, hereby certify that on this 1st day of May 2006, I electronically filed a true and correct copy of the foregoing **Motorola's Motion** for Summary Judgment with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

> David Allan Felice Cozen O'Connor Chase Manhattan Centre, 1201 North Market, Suite 1400 Wilmington, DE 19801

I further certify that on this 1<sup>st</sup> day of May 2006, I mailed by United States Postal Service the foregoing Motorola's Motion for Summary Judgment to the following non-registered participant:

> Kevin F. Berry Cozen O'Connor 1900 Market Street Philadelphia, PA 19103

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ William W. Bowser

William W. Bowser, Esquire (Bar I.D. 2239)

1000 West Street

Wilmington, Delaware 19801 Telephone: (302) 571-6601 Facsimile: (302) 576-3282

Email: wbowser@ycst.com

DB01:1538162.1 063528.1001